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Attorneys for Plaintiff Dustin Gaj

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DUSTIN GAJ, Derivatively on Behalf of
WYNN RESORTS, LTD.,

Plaintiff,

v.

STEPHEN A. WYNN, MATTHEW
MADDOX, KIMMARIE SINATRA, D.
BOONE WAYSON, ALVIN V.
SHOEMAKER, JOHN J. HAGENBUCH,
ROBERT J. MILLER, RAY R. IRANI,
PATRICIA MULROY, CLARK T.
RANDT, JR., JAY L. JOHNSON, MARC
D. SCHORR, J. EDWARD VIRTUE,
STEPHEN COOTEY, and CRAIG S.
BILLINGS,

Defendants,

-and-

WYNN RESORTS, LTD., a Delaware
Corporation,

Nominal Defendant.

Case No. 2:19-cv-00505-KJD-CWH

**STIPULATION TO EXTEND BRIEFING
SCHEDULE**

(FIRST REQUEST)

1 This is the first stipulation to extend the briefing schedule for defendant Marc D. Schorr's Motion
2 to Dismiss Complaint (Doc No. 67).

3 WHEREAS, on June 25, 2019, plaintiff Dusitn Gaj ("Plaintiff") and all defendants except
4 defendant Marc D. Schorr ("Schorr") submitted a stipulation setting forth the following briefing schedule
5 regarding motions to dismiss: (1) defendant Stephen Cootey ("Cootey") may file a response to the
6 complaint on or before June 26, 2019; (2) defendant Kimmarie Sinatra ("Sinatra") may file a response to
7 the complaint on or before July 8, 2019; and (3) Plaintiff shall file an omnibus opposition to the already
8 pending motions to dismiss and any motions to dismiss (Doc. Nos. 56 and 53) filed by Cootey or Sinatra
9 on or before August 8, 2019, and defendants (with the exception of defendant Schorr) shall file their
10 replies by September 2, 2019 (the "Scheduling Stipulation") (Doc. No. 51);

11 WHEREAS, on June 28, 2019, the Court approved and entered the Scheduling Stipulation (Doc.
12 No. 55);

13 WHEREAS, prior to the entry of the Scheduling Stipulation, counsel for defendant Schorr had not
14 yet appeared as counsel or accepted service;

15 WHEREAS, on July 10, 2019, defendant Schorr filed the Stipulation Regarding Acceptance of
16 Service By Marc D. Schorr ("Service Stipulation") (Doc. No. 62);

17 WHEREAS, on July 16, 2019, the Court granted the Service Stipulation (Doc. No. 65);

18 WHEREAS, on July 18, 2019, defendant Schorr filed: (1) a motion to dismiss (Doc. No. 67); and
19 (2) a notice of joinder in the Wynn Resort Defendants' and defendant Sinatra's motions to dismiss (Doc.
20 No. 68) (together, "Defendant Schorr's Motion to Dismiss");¹

21 WHEREAS, Plaintiff and defendant Schorr respectfully submit that a unified briefing schedule
22 will serve judicial efficiency and conserve resources; and

23 WHEREAS, Plaintiff's counsel and defendant Schorr's counsel have met and conferred and agree
24 that briefing on Defendant Schorr's Motion to Dismiss shall be on the same schedule as that for all other
25 defendants;

26
27 ¹ "Wynn Resort Defendants" refers to defendants Matthew Maddox, D. Boone Wayson, Alvin V.
28 Shoemaker, John J. Hagenbuch, Robert J. Miller, Ray R. Irani, Patricia Mulroy, Clark T. Randt, Jr., Jay
L. Johnson, J. Edward Virtue, Craig S. Billings, and nominal defendant Wynn Resorts, Ltd.

1 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED by Plaintiff and defendant
2 Schorr, through their respective counsel of record, as follows:

3 1. Plaintiff's opposition to Defendant Schorr's Motion to Dismiss shall be incorporated into
4 his omnibus opposition to be filed on or before August 8, 2019, pursuant to the Scheduling Stipulation;
5 and

6 2. Defendant Schorr shall file his reply on or before September 2, 2019.

8 Dated: July 29, 2019

Respectfully submitted,

9 /s/ Steven R. Wedeking

10 STEVEN R. WEDEKING
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Attorneys for Plaintiff Dustin Gaj

22 Dated: July 29, 2019


/s/ Richard A. Schonfeld

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Attorney for Defendant Marc D. Schorr

1 IT IS SO ORDERED.

2
3 Dated: August 1, 2019



HONORABLE KENT J. DAWSON
UNITED STATES DISTRICT JUDGE